

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

MARY JANE EUSTACE,)
RUTH CHAPPEL and)
CONSTANCE M. RODD,)
Plaintiffs)
v.) C.A. NO. 3:17-CV-30158
SPRINGFIELD PUBLIC SCHOOLS,)
Defendant)

**JOINT PROPOSED AGENDA FOR SCHEDULING CONFERENCE,
PROPOSED PRETRIAL SCHEDULE AND DISCOVERY PLAN**

Pursuant to Fed. R. Civ. P. 26(f) and Local Rule 16.1, the parties have conferred regarding a joint proposed pretrial case schedule and discovery plan and they present this Agenda for Scheduling Conference, Joint Proposed Pretrial Schedule, and Proposed Discovery Plan.

I. Agenda for Initial Status Conference

The parties have agreed to the following agenda for the status conference, which the Court has scheduled for March 1, 2018 at 3:15 p.m.

1. Status Report
2. Overview of the Case and Major Issues
3. Proposed Pre-Trial Schedule and Discovery Plan (Agreed Upon and Disputed Issues)
4. Status of Settlement Discussions

II. Proposed Pretrial Schedule and Discovery Plan

The plaintiffs submit that this case warrants a seven-month discovery period. The Defendant submits that this case warrants a nine-month discovery period. The parties submit the following deadlines:

1. Discovery Plan. The parties jointly propose to the court the following discovery plan.

- a. **Agreed Upon Topics of Discovery.** Discovery, to the extent not privileged or otherwise not discoverable, is necessary as to topics including but not limited to: the parties' employment history with defendant and the plaintiffs' requests for accommodations. The parties reserve the right to conduct discovery on subjects not listed above and to object to discovery sought regarding the subjects listed above.
- b. **Initial Disclosures.** The parties will exchange the information required by Fed. R. Civ. P. 26(a)(1) no later than fourteen (14) days after the scheduling conference, by March 15, 2018.

- c. **Amendment and Joinder:**

Plaintiff's Statement on Amendment and Joinder.

Defendant's Statement on Amendment and Joinder. Defendant proposes that all additional parties be added and all amendments be made by April 6, 2018.

- d. **Discovery Deadline.** All discovery (written and deposition) shall be completed within [seven (7)]/[nine (9)] months, by [October 1, 2018]/[December 3, 2018].

e. Modifications to Limitations on Discovery Imposed by the Federal Rules.

The parties do not anticipate any modifications to the limitations on discovery at this time. If the need for additional discovery arises, the parties will request the same from the Court.

f. Expert Discovery. The parties do not expect expert discovery to be needed at this time, but reserve the right to amend this discovery plan if expert testimony is needed.

g. Dispositive Motions. All dispositive motions will be filed no later than two (2) months after close of discovery, by [December 1, 2018]/[February 4, 2019.]

h. Plaintiff's Statement on Settlement. On February 22, 2018, plaintiffs provided to the Defendant a written settlement statement.

Defendant's Statement on Settlement. Defendant will respond at the scheduling conference.

2. Trial. The parties agree that a trial, if needed, will last 3-4 days.

3. Certifications by Counsel. Pursuant to Local Rule 16.1(d)(3), counsel will separately file their respective certifications prior to the Scheduling Conference.

III. Consent to Magistrate Judge

Both parties have not consented to appearing before a magistrate judge.

Respectfully submitted,

MARY JANE EUSTACE, RUTH
CHAPPEL, and CONSTANCE M.
RODD, Plaintiffs
By their attorneys,

/s/ Jillian M. Ryan

Terence E. Coles, BBO #600084
Jillian M. Ryan, BBO #682214
Pyle Rome Ehrenberg, PC
2 Liberty Square, 10th Floor
Boston, MA 02109
Tel: (617) 367-7200

Dated: February 22, 2018

SPRINGFIELD PUBLIC SCHOOLS,
Defendant
By its attorneys,

/s/ Mary J. Kennedy

Mary J. Kennedy, BBO #552345
Mary Ellen MacDonald, BBO # 641658
Bulkley, Richardson and Gelinas, LLP
1500 Main Street – Suite 2700
Springfield, MA 01115
Tel: (617) 368-2503
Fax: (413) 272-6806
mckennedy@bulkley.com
mmacadonald@bulkley.com

CERTIFICATE OF SERVICE

I, Mary J. Kennedy, attorney for Defendant, Springfield Public Schools, in the above matter, hereby certify that a true copy of the above document was served upon all parties through the ECF system and if not registered on the ECF system, by first class mail, on February 22, 2018.

/s/ Mary J. Kennedy

Mary J. Kennedy

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